

# Privacy Policy



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## Introduction

Welcome to our privacy policy. We are GameSmart (Pty) Ltd (Registration number 2004/029780/07) and this is our plan of action when it comes to protecting your privacy. We respect your privacy and take the protection of personal information very seriously. The purpose of this policy is to describe the way that we collect, store, use, and protect information that can be associated with you or another specific natural or juristic person and can be used to identify you or that person (**personal information**).

## Audience

This policy applies to you if you are:

- a visitor to our website; or
- a customer who has ordered or requested the goods or services that we provide.

## Personal information

Personal information includes:

- certain information that we collect automatically when you visit our website;
- certain information collected on registration (see below);
- certain information collected on submission; and
- optional information that you provide to us voluntarily (see below);

but excludes:

- information that has been made anonymous so that it does not identify a specific person;
- permanently de-identified information that does not relate or cannot be traced back to you specifically;
- non-personal statistical information collected and compiled by us; and
- information that you have provided voluntarily in an open, public environment or forum including any blog, chat room, community, classifieds, or discussion board (because the information has been disclosed in a public forum, it is no longer confidential and does not constitute personal information subject to protection under this policy).

## **Common examples**

Common examples of the types of personal information which we may collect and process include your:

- **identifying information** – such as your name, date of birth, or identification number of any kind;
- **contact information** – such as your phone number or email address; or
- **address information** – such as your physical or postal address.

## **Sensitive personal information**

Depending on the goods or services that you require, we may also collect sensitive personal information including your:

- **financial information** – such as your bank account details;

## **Acceptance**

### **Acceptance required**

You must accept all the terms of this policy when you order our goods or request our services. If you do not agree with anything in this policy, then you may not order our goods or request our services.

### **Legal capacity**

You may not access our website or order our goods or request our services if you are younger than 18 years old or do not have legal capacity to conclude legally binding contracts.

### **Deemed acceptance**

By accepting this policy, you are deemed to have read, understood, accepted, and agreed to be bound by all of its terms.

### **Your obligations**

You may only send us your own personal information or the information of another data subject where you have their permission to do so.

## **Changes**

We may change the terms of this policy at any time by updating this web page. We will notify you of any changes by placing a notice in a prominent place on the website or by sending you an email detailing the changes that we have made and indicating the date that they were last updated. If you do not agree with the changes, then you must stop using the website and our goods or services. If you continue to use the website or our goods or services following notification of a change to the terms, the changed terms will apply to you and you will be deemed to have accepted those updated terms.

## Collection

### On registration

Once you log in on our website, you will no longer be anonymous to us.

If you register as a customer you will provide us with certain personal information.

This personal information will include:

- your name and surname;
- your email address;
- your telephone number;
- your company name, company registration number, and VAT number; and
- your postal address or street address.

We will use this personal information to fulfill your account, provide additional services and information to you as we reasonably think appropriate, and for any other purposes set out in this policy.

### On order or request

When you order our goods or request our services from us, you will be asked to provide us with additional information on a voluntary basis (**goods or services information**).

### From browser

Please note that other websites visited before entering our website might place personal information within your URL during a visit to it, and we have no control over such websites. Accordingly, a subsequent website that collects URL information may log some personal information.

## Cookies

We may place small text files called 'cookies' on your device when you visit our website. These files do not contain personal information, but they do contain a personal identifier allowing us to associate your personal information with a certain device. These files serve a number of useful purposes for you, including:

- granting you access to age restricted content;
- tailoring our website's functionality to you personally by letting us remember your preferences;
- improving how our website performs; and
- allowing third parties to provide services to our website.

Your internet browser generally accepts cookies automatically, but you can often change this setting to stop accepting them. You can also delete cookies manually. However, no longer accepting cookies or deleting them will prevent you from accessing certain aspects of our website where cookies are necessary. Many websites use cookies and you can find out more about them at [www.allaboutcookies.org](http://www.allaboutcookies.org).

### **Third party cookies**

Some of our business partners use their own cookies or widgets on our website. We have no access to or control over them. Information collected by any of those cookies or widgets is governed by the privacy policy of the company that created it, and not by us.

### **Purpose for collection**

We may use or process any goods or services information, or optional information that you provide to us for the purposes that you indicated when you agreed to provide it to us. Processing includes gathering your personal information, disclosing it, and combining it with other personal information. We generally collect and process your personal information for various purposes, including:

- **goods or services purposes** – such as collecting orders or requests for and providing our goods or services;
- **marketing purposes** – such as pursuing lawful related marketing activities;
- **business purposes** – such as internal audit, accounting, business planning, and joint ventures, disposals of business, or other proposed and actual transactions; and
- **legal purposes** – such as handling claims, complying with regulations, or pursuing good governance.

We may use your usage information for the purposes described above and to:

- remember your information so that you will not have to re-enter it during your visit or the next time you access the website; and
- monitor website usage metrics such as total number of visitors and pages accessed.

### **Consent to collection**

We will obtain your consent to collect personal information:

- in accordance with applicable law;
- when you provide us with any registration information or optional information.

### **Use**

#### **Our obligations**

We may use your personal information to fulfill our obligations to you.

#### **Messages and updates**

We may send administrative messages and email updates to you about the website. In some cases, we may also send you primarily promotional messages. You can choose to opt-out of promotional messages.

#### **Disclosure**

#### **Sharing**

We do not share your personal information.

## **Regulators**

We may disclose your personal information as required by law or governmental audit.

## **Law enforcement**

We may disclose personal information if required:

- by a subpoena or court order;
- to comply with any law;
- to protect the safety of any individual or the general public; and
- to prevent violation of our customer relationship terms.

## **No selling**

We will not sell personal information. No personal information will be disclosed to anyone except as provided in this privacy policy.

## **Marketing purposes**

We may disclose aggregate statistics (information about the customer population in general terms) about the personal information to advertisers or business partners.

## **Employees**

We may need to disclose personal information to our employees that require the personal information to do their jobs. These include our responsible management, human resources, accounting, audit, compliance, information technology, or other personnel.

## **Change of ownership**

If we undergo a change in ownership, or a merger with, acquisition by, or sale of assets to, another entity, we may assign our rights to the personal information we process to a successor, purchaser, or separate entity. We will disclose the transfer on the website. If you are concerned about your personal information migrating to a new owner, you may request us to delete your personal information.

## **Security**

We take the security of personal information very seriously and always do our best to comply with applicable data protection laws. Our hosting company will host our website in a secure server environment that uses a firewall and other advanced security measures to prevent interference or access from outside intruders. We authorize access to personal information only for those employees who require it to fulfill their job responsibilities. We implement disaster recover procedures where appropriate.

## **Accurate and up to date**

We will try to keep the personal information we collect as accurate, complete and up to date as is necessary for the purposes defined in this policy. From time to time we may request you to update your personal information on the website. You are able to review or update any personal information that we hold on you by accessing your account online, emailing us, or phoning us. Please note that in order to better protect you and safeguard your personal information, we take

steps to verify your identity before granting you access to your account or making any corrections to your personal information.

### **Retention**

We will only retain your personal information for as long as it is necessary to fulfill the purposes explicitly set out in this policy, unless:

- retention of the record is required or authorized by law; or
- you have consented to the retention of the record.

During the period of retention, we will continue to abide by our non-disclosure obligations and will not share or sell your personal information.

We may retain your personal information in physical or electronic records at our discretion.

### **Transfer to another country**

We will not transfer any personal information across a country border without your prior written consent.

### **Updating or removing**

You may choose to remove or update the personal information you have submitted to us, by clicking the relevant menu in any of the pages on our website or contacting us by phone or email.

### **Limitation**

We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of linked or any third party websites.

### **Enquiries**

If you have any questions or concerns arising from this privacy policy or the way in which we handle personal information, please contact us.